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October 8, 2014

VIA ECF FILING

Honorable Judge Kenneth M. Karas
U.S. District Court Judge
The Hon. Charles L. Brieant Jr.
Federal Building & Courthouse
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: Edward J. Reynolds v. LifeWatch, Inc., et al.
Civil Action No.: 14-CV-3575 (KMK)
Our File No.: 170.191

Dear Honorable Judge Karas:

Our law firm represents the plaintiff, Edward J. Reynolds, D.D.S., individually and on behalf of all others similarly situated, in the captioned class action case. This letter is a joint request for an extension of the briefing schedule for the defendants' motion to dismiss. The current schedule provides for the defendants to file their motion by October 13, 2014, the plaintiff to file his opposition by November 14, 2014 and the defendants to file their reply by December 4, 2014.

The parties have exchanged limited discovery related to the jurisdictional issues. Additional information will be exchanged after a Discovery Confidentiality Order is signed by the Court. The parties are in the process of finalizing the proposed Order and it should be submitted to the Court later today.

Based on the information exchanged to date, the plaintiff will be amending the complaint to add additional parties. We will be able to do so after we obtain additional information and documents from the defendants, which they will provide once the Discovery Confidentiality Order is signed.

Therefore, the parties hereby jointly request that the briefing schedule be extended 30 days, with the defendants' motion being filed by November 14, 2014, the plaintiff's opposition being filed by December 16th, and the defendants' reply being filed by January 6, 2015.

We thank Your Honor for your time and consideration.

Respectfully yours,

GAINEY McKENNA & EGGLESTON



Barry J. Gainey

BJG/dxg

cc: All counsel
Via ECF Filing